

Management Board Decision

DECISION N° 04-2021

of 10 December 2021

**adopting the Code of Conduct for
the Management Board of the European Union Aviation Safety Agency (EASA)**

THE MANAGEMENT BOARD OF THE EUROPEAN UNION AVIATION SAFETY AGENCY,

Having regard to Regulation (EU) 2018/1139 of the European Parliament and of the Council on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency¹, hereinafter referred to as the “Basic Regulation” and in particular Article 98(2)(o) thereof;

Whereas:

(1) The Commission and the Member States are represented within the Management Board in order to control effectively the functions of the Agency, entrusted with the necessary powers, as stipulated in Article 98 of the Basic Regulation, to establish the budget, verify its execution, adopt the appropriate financial rules, establish transparent working procedures for decision making in the Agency and appoint the Executive Director.

(2) The Management Board recognises the sensitivity of its tasks and the need for rules for the prevention and management of conflicts of interest in respect to its members in line with requirements from the European Parliament and the Ombudsman related to the Code of Good Administrative Practices. Such rules need to ensure that the principles of impartiality, fairness and transparency are properly applied;

(3) EASA should avoid any conflict of interest in the implementation of its activities;

(4) Integrity and high standards of professional conduct by all those involved in the tasks and activities of EASA are crucial for the independence and reputation of EASA;

(5) The members of the Management Board, are appointed by their respective Member States, because of their knowledge, recognised experience and commitment in the field of civil aviation, as well as their managerial, administrative and budgetary expertise, which are to be used to further the objectives of the Basic Regulation;

(6) The current Code of Conduct as established by the Management Board² needs to be revised in the light of the amended Basic Regulation and the experience and working practice of the Management Board;

(7) The primary responsibility for assessing whether an interest might impede independence or influence judgment and for declaring any possible conflict of interest is placed on the Members and alternates concerned.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.08.2018, p. 1).

² As established by EASA MB Decision 11-2012 of 10 December 2012.



Article 1

The “Code of Conduct for the Management Board of EASA” including its annexes laid down in the Annex to this Decision is hereby adopted.

Article 2

1. For the purpose of this Code of Conduct the following terms shall be defined as explained:
 - (a) “Member States” means the European Union and the European Commission (Member States with voting rights), as well as Iceland, Liechtenstein, Norway and Switzerland (Member States without voting rights).
 - (b) “Observer(s)” means the European third countries (falling outside of the definition in (a)) invited to take part in the Management Board, as well as the four stakeholder advisory body representatives appointed by that advisory body.
 - (c) “Members” and “alternates” means the representatives appointed by each Member State and Observer.
 - (d) The “public” and “individuals” refer to both natural and legal persons, in particular external stakeholders, regardless if they reside or have their registered office in a Member State or not.

Article 3

The “Code of Conduct for the Management Board of the European Aviation Safety Agency” including its Annexes adopted by Management Board Decision 12-2012 is hereby repealed.

Done in Cologne, 10 December 2021

<signed>

Piotr Samson

Chair of the Management Board



ANNEX

CODE OF CONDUCT FOR THE MANAGEMENT BOARD OF THE EUROPEAN UNION AVIATION SAFETY AGENCY (EASA)

Article 1

Scope

1. The members and alternates of the Management Board commit to meet the highest standards in performing their duties in the public interest, and respect the Code of Conduct here laid down.
2. The Code of Conduct shall apply to all members and alternates to the Management Board, in the performance of its function, including in its relationship with the public.
3. The Management Board shall take the necessary measures to ensure that members and alternates comply with the provisions of the Code of Conduct.

Article 2

Principles

2. In the performance of their duties, including the relations with the public, members and alternates of the Management Board shall respect the principles which are laid down in this Code of Conduct.
3. In their role, whether acting independently, individually or collectively in the public interest, Management Board members and alternates shall observe and be guided by the following principles: Integrity³, Diligence⁴, Discretion⁵, Honesty⁶, Objectivity⁷, Respect for others⁸, Collegiality⁹, Non-discrimination¹⁰ and Accountability¹¹.
4. Management Board members and alternates shall avoid any situation that gives rise to potential conflict of interest and shall act transparently in their duties. Furthermore, the members and alternates shall conduct themselves in a way that maintains and promotes trust among themselves and the public's trust in EASA.

Article 3

Lawfulness

1. The members and alternates shall act according to law and apply the rules laid down in applicable law and procedures. The members and alternates shall in particular ensure that decisions which affect the

³ **Integrity** implies a duty to be guided by a sense of propriety and to conduct one-selves in a manner that would bear the closest public scrutiny, also with regard to financial or other contributions.

⁴ **Diligence** implies a duty to examine carefully and impartially all the relevant elements for a decision.

⁵ **Discretion** implies that any sensitive information shared related to the Management Board must be managed with the utmost discretion.

⁶ **Honesty** implies a duty to act at all times honestly and truthfully.

⁷ **Objectivity** implies a duty to be impartial, open-minded, guided by evidence, and willing to hear different viewpoints. One should be ready to acknowledge and correct mistakes.

⁸ **Respect for others** implies a duty to act respectfully to each other and to other persons who interact with the Management Board in a polite, helpful, timely, and co-operative manner.

⁹ **Collegiality** implies a duty to respect the professional standing of the other Management Board members and alternates and not to engage in any practice detrimental to the reputation and interests neither of the Management Board nor of EASA.

¹⁰ **Non-discrimination** implies that nobody should be discriminated by any means (for example, on grounds such as gender, colour, ethnic or social origin, language or disability).

¹¹ **Accountability** implies a duty to be at all times ready to give an explanation or justification for a decision and action.



rights or interests of individuals have a basis in, and comply with, the law and are not motivated by any private interests.

Article 4

Absence of abuse of power

1. The members and alternates shall exercise their powers solely for the purpose for which they have been conferred by the relevant provisions. The members and alternates shall in particular avoid using those powers for purposes which have no basis in the law, or which are not motivated by any public interests.

Article 5

Absence of discrimination

1. The members and alternates shall ensure that the principle of equal treatment is respected. Members of the public who are in the same situation shall be treated in a similar manner.
2. The members and alternates shall in particular avoid any unjustified discrimination based on nationality, sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age, or sexual orientation.
3. If any difference in treatment is made, the members and alternates shall ensure that it is justified by the objective relevant features of the particular case.

Article 6

Proportionality

1. When taking decisions, the members and alternates shall ensure that the measures taken are proportional to the aim pursued. The members and alternates shall in particular avoid restricting the rights of individuals or imposing charges on them, when those restrictions or charges are not in a reasonable relation with the purpose of the action pursued.
2. When taking decisions, the members and alternates shall respect the fair balance between the interests of individuals and the general public interest.

Article 7

Impartiality and independence

1. The members and alternates shall be impartial, independent and abstain from any arbitrary action adversely affecting members of the public, as well as from any preferential treatment on any grounds whatsoever.
2. The members and alternates shall not be guided by personal interest or any outside influences of any kind, including political pressure or influences.
3. The members and alternates shall abstain from handling matters which involve his or her own interest, or those of his or her family, relatives, friends and acquaintances.
4. A policy on impartiality and independence prevention and mitigation of conflict of interest is laid down in Appendix 1.



Article 8
Confidentiality

1. Members and alternates shall not disclose to the public any confidential information or data coming to their knowledge during the performance of their duties in the Management Board.
2. Members and alternates shall be subject to requirements of confidentiality even after their duties have ceased.
3. For this purpose, the members and alternates to the EASA Management Board, its working or advisory groups shall make upon their appointment, a declaration of commitment and confidentiality, in accordance with Appendix II.

Article 9
Objectivity

1. When taking decisions, the members and alternates shall take into consideration all relevant factors and give each of them its proper weight in the decision, whilst excluding any irrelevant elements.

Article 10
Legitimate expectations and consistency

1. The members and alternates shall respect legitimate and reasonable expectations in light of how the Management Board has acted in the past.
2. The members and alternates shall be consistent in their own administrative practice as well as with the administrative action of the Management Board. The members and alternates shall follow the Management Board's normal administrative practices, unless there are legitimate grounds for departing from those practices in an individual case; these grounds shall be recorded in writing.

Article 11
Fairness

1. The members and alternates shall act impartially, fairly and reasonably.

Article 12
Acknowledgment of receipt

1. All correspondence addressed to the Management Board shall receive an acknowledgement of receipt within a period of two weeks, except if a substantive reply can be sent within that period.
2. No acknowledgement of receipt and no reply need to be sent in cases where correspondence is abusive, because of their excessive number or because of their repetitive or pointless character.

Article 13
Obligation to transfer files to the Agency

1. If a letter or a complaint is addressed or transmitted to the Management Board, it shall ensure that the file is transferred without delay to the Agency, if the Agency is the competent service to deal with it.



2. The Management Board shall notify the author of the letter or complaint of this transfer in the acknowledgement of receipt by indicating the contacts to whom the file has been passed.

Article 14
Data protection

1. The Management Board in dealing with personal data concerning an individual shall respect the privacy and the integrity of the individual in accordance with the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.¹²
2. The Management Board shall not process personal data for non-legitimate purposes nor transfer such data to non-authorised persons.

Article 15
Requests for information

1. The Management Board shall handle requests for information in accordance with the applicable Agency rules and procedures.
2. The Management Board shall inform and as appropriate refer relevant requests for information to the Executive Director of the Agency for further processing.
3. The Management Board shall advise the individual requesting the information accordingly.

Article 16
Requests for Public access to documents

1. The Management Board shall refer requests for access to documents to the Executive Director of the Agency. The request shall be processed in accordance with the Agency's Public Access to EASA Documents procedure, including related forms, and in accordance with the general principles and limits laid down in Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.¹³ The Management Board shall advise the individual requesting the information accordingly.

Article 17
Publicity for the Code of Conduct

1. The Management Board undertakes to make the content of the Code of Conduct known to the members and alternates and to the public, via publication on the EASA website.

¹² OJ L 295, 21.11.2018, p. 39-98.

¹³ OJ L 145, 31.05.2001, p. 43.



Appendix I

POLICY ON IMPARTIALITY AND INDEPENDENCE PREVENTION AND MITIGATION OF CONFLICT OF INTEREST

Table of Contents

1	Purpose and scope	8
2	Concept of Conflict of interest	8
3	The management of Conflict of Interest	9
4	Principle of declaration of interests	9
4.1	Category of interests	9
i.	Financial Interests.....	9
ii.	Professional Interests	9
iii.	Intellectual Interests.....	10
iv.	Direct and indirect interests.....	10
4.2	Declaration of interests	10
4.3	Assessment of declaration and decision	12
4.4	Request for review of the Assessment Committee assessment	13
4.5	Publication, recording and personal data protection	11
5	Gifts, hospitality, decorations and honours	11
5.1	Declaration and registration.....	11
5.2	Gifts register and personal data protection	11
6	Breach of this policy	13
7	Training and information.....	13



1 Purpose and scope

The purpose of this policy is to establish the principles governing impartiality and independence of the members and alternates and define the measures to ensure their practical application in order to prevent and mitigate the risk that past, current or future interests might improperly influence the impartiality and the independence of the members and alternates during the performance of their duties. These principles and measures cover among others the management of:

- Situations of potential Conflict of Interest (declaration, monitoring, training/information);
- Situations of alleged or actual Conflict of Interest.

When deemed necessary to complete the existing applicable EU and EASA Regulations, the policy will refer to the OECD guidelines¹⁴.

2 Concept of Conflict of interest

What is a Conflict of Interest (Col) for the European Commission¹⁵?

According to the European Commission, situations of Conflict of Interest (Col) can arise when:

- there is some link between members and alternates' work and their private interest, or those of their family or partner;
- Members and alternates find themselves in a situation that could reasonably lead to allegations being made of bias or partiality, in the light of their personal interests.

OECD guidelines define the potential and actual Col as follows:

Actual Col: involves a conflict between the public duty and private interests of an official, in which the official has private-capacity interests which could improperly influence the performance of their duties and responsibilities.

Potential Col: occurs where an official has private interest which are such that a Col would arise if the official were to become involved in relevant (i.e conflicting) responsibilities in the future.

Conflict of Interest for EASA Management Board:

For the purpose of this policy, the concept of Col refers to and follows the European Commission guidance with the necessary adaptation. Moreover, distinction will be made between potential and actual Col, as proposed in the OECD guidelines. Alleged situation of Col is considered in case of actual Col where evidence has not been established.

Certain reasons (such as family or emotional life, political or national affinity, economic interests) may compromise the impartial and objective exercise of functions by a Members and alternates.

The holding of interests does not automatically give rise to a Col, if the independence and objectivity of decisions are not at risk. A Col may exist even if no unethical or improper act results from it. A Col can create an appearance of impropriety that can undermine confidence in the person, profession, or the organisation.

¹⁴: Managing Conflict of Interest in the Public Service: OECD Guidelines and Country Experiences (OECD, Paris, 2003).

¹⁵ http://myintracomm.ec.testa.eu/hr_admin/en/ethics/obligations/conflicts_interest/Pages/conflicts_interest.aspx



3 The management of Conflict of Interest

The members and alternates shall be and remain impartial and independent when acting in their official capacity as members and alternates. In order to ensure compliance with this requirement, the Management Board applies the following principles and measures for the management of Col:

- Declaration of Interests;
- Gifts and hospitality;
- Breach of the policy;
- Training and information

as outlined below.

4 Declaration of Interests

In order to prevent, detect, monitor, mitigate and deal with situations of potential and actual Col, the Management Board applies the principle of declaration of interests to be filled by each member and alternate and assessed by a dedicated Assessment Committee, defined in Article 6 of this Appendix.

4.1 Category of interests

There are essentially three categories of interests: (a) financial interests, (b) professional interests and (c) intellectual interests. These can be further divided into direct and indirect interests.

Any interests stemming from prior experience or affiliations of the member or alternate should be declared only insofar as they relate directly to the activities of the member or alternate.

i. Financial Interests

Financial interests shall include the holding of stocks and shares, equity, bonds, partnership interests in the capital of an organisation, related to the activities of EASA, one of its subsidiaries or a company in the capital of which it has a holding.

Share portfolios need not be disclosed if the management arrangement is in the form of a blind trust or equivalent where the member or alternate has not control whatsoever over its management.

ii. Professional Interests

Professional interests shall include those performed for, or on behalf of organisations¹⁶ or companies¹⁷ related to the activities of EASA with or without direct or indirect pecuniary or material benefits, e.g.:

- Any form or regular occupation or business (e.g: permanent or temporary; full-time or part-time, unpaid leave,...), employment (including self-employment) or work contracted out through consultancy or otherwise;
- Participation in internal decision-making bodies (e.g. directorships, board membership, executive or non-executive directorship, etc.);
- Grants for travel, study or research, fellowships or sponsorships.

¹⁶ An 'organisation' includes governmental, international or non-profit organisations

¹⁷ This includes any commercial business, industry association, consultancy, research institution or other enterprise whose funding is significantly derived from commercial sources. It also includes independent own commercial business, law offices, consultancies or similar.



iii. Intellectual interests

Intellectual interests shall include interests of non-pecuniary or material benefit to the member or alternate, arising from professional activities or affiliation with national or international organisations or bodies with tasks mirroring those of EASA. Intellectual interests also include participation in public interest groups, professional/scientific societies, communication media, clubs or organisations which have an agenda or an interest or involvement in EASA's work.

iv. Direct and indirect interests

Interests can be direct or indirect depending on their likely or potential impact on the member's or alternate's behaviour at a given point in time:

- Direct interests: Interests of personal benefit to the member or alternate at the time of the declaration that are likely to influence or give the appearance of influencing his or her behaviour (e.g. direct employment with an organisation related to the activities of EASA, financial interests of a certain magnitude, etc.)
- Indirect interests: Other interests that may have some influence over the member's or alternate's behaviour and therefore have to be declared and neutralised (e.g. indirect financial benefits, benefits deriving from the professional activities of members of the member's or alternate's family/household, etc).

The holding of direct interests of a certain breadth could be incompatible with participation to the EASA Management Board or its working or advisory groups. The holding of indirect interests is not prohibited but should be scrutinised so that precautions can be taken in order to ensure impartiality of decision making.

4.2 Annual declaration of interests

All members and alternates shall fill in the "Public Annual Declaration of Interests (PADoI) for the EASA Management Board, its working or advisory groups" (Appendix III).

The responsibility for a complete and truthful declaration shall lie exclusively with the members and alternates declaring his or her interest.

All members and alternates shall declare any interest belonging to the categories listed in Article 4.1 with respect to all activities in which they are involved or have been involved during the five years preceding the submission of the PADoI and all activities in which they are currently involved. The PADoI shall be sent to the MB Secretariat.

The PADoI form in Appendix III shall be filled by a member or alternate both before taking up function, and following that, once every year. Should there be any change to the information provided in the PADoI due to the fact that the member or alternate acquires additional interests or an interest no longer exist, he or she shall promptly notify the Chair of the Management Board and the MB Secretariat and complete a new PADoI.

In case the Chair of the Management Board and/or Assessment Committee has or obtains knowledge of information that is not consistent with the declared interests, or in case of failure to submit the declaration of interests, the members and alternates will be contacted with the purpose to submit the declaration of interests. Failure to rightly declare interest and/or failure to submit a declaration of interest may lead to restriction of access to meetings and documentation, as decided by the Assessment Committee. Additionally, an internal procedure may be opened as referred to in Article 7 'Breach of this policy'.

4.3 Publication, recording and personal data protection

The PADoI of all members and alternates of the EASA Member States and the Commission will be published on the EASA website.

EASA shall process all declaration of interests in accordance with the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.¹⁸

The MB secretariat will assist the Management Board in controlling the handling the PADoIs.

The conservation period of declaration of interests and the related Assessment Committee assessment shall be 7 years.

The members and alternates have a right to access their respective declaration of interests, and to update or correct it at any time, as well as to the respective Assessment Committee assessment.

5 Gifts, hospitality, decorations and honours

5.1 Definition of gifts

The concept of gifts and other benefits must be understood in a broad sense, covering both physical items and non-physical items, as well as direct and indirect gifts¹⁹. Monetary gifts also fall into this category.

5.2 Declaration and registration

Members and alternates shall not accept any gift with a value of more than 150 EUR related to their performance and duties in the Management Board, its working or advisory groups.

When in accordance with diplomatic and courtesy usage, they receive gifts worth more than this amount, they shall hand them over to the MB secretariat. In case of doubt as to the value of a gift, an evaluation shall be undertaken by the Assessment Committee, whose decision on the matter shall be final.

The MB secretariat shall keep a register of gifts with value more than 150 EUR.

Members and alternates shall notify the Chair of the Management Board, of any decoration, prize or honour awarded to them in relation of their performance and duties for the EASA Management Board. Should a prize include a sum of money or valuables, it should be donated to a charity of their choice.

An internal procedure may be opened as referred to in Article 7 'Breach of this policy', in the event of non-consistent information of the declaration of gifts, hospitality, invitations, honours, or in case of failure to declare.

5.3 Gifts register and personal data protection

The MB Secretariat shall process the gifts register in accordance with Regulation (EU) 2018/1725.

The MB secretariat controls the handling of the gifts register.

The members and alternates have a right to access their data within the gifts register to update or correct them at any time.

¹⁸ OJ L 295, 21.11.2018, p. 39-98.

¹⁹ Indirect gifts are those which are not offered directly to staff members, but to a third party that is close to the Management Board member or alternate.



6 Assessment Committee

6.1 Scope

For the purpose of this policy, an Assessment Committee is established for the assessment of the declaration of interests of the Management Board members and alternates, in accordance with Article 4.

The Assessment Committee shall also assess the value of gifts a member or alternate receives, in case there is an existing doubt of the value, in accordance with Article 5.

The Assessment Committee shall be consulted by the Management Board Chair, in case a breach of this policy is detected, in accordance with Article 7.

6.2 Assessment Committee composition

The Assessment Committee shall be composed as minimum of:

- The European Commission representative to the Management Board (Chairperson) and one alternate from the 'Aviation and International Transport Affairs' unit of the Directorate General for Mobility and Transport (DG MOVE);
- A representative of the Shared Resources Department of DG MOVE, and one alternate;
- The Chair of the Management Board and as alternate, the Deputy Chair;
- The EASA Chief Legal advisor (Secretary), and one alternate.

In addition, one representative of another European Regulatory Agency dealing with related matters, including Col shall be invited when a review of an Assessment Committee opinion is requested by the concerned Members and alternates. This representative and its alternate are not members of the Assessment Committee.

The Assessment Committee is to establish, adopt and publish its own Guidelines.

These Guidelines shall include:

- clear, objective assessment criteria and possible related decision;
- the methodology for the assessment of the declaration of interests submitted to it;
- the methodology for the review of the assessment and its related decision, requested by the members and alternates;

in line with this Decision, its Annex and Appendixes.

6.3 Assessment of declaration of interest and decisions

The Assessment Committee shall take any measure considered appropriate to ensure that potential Col does not occur or to remedy to any actual Col.

Based on the disclosure, or lack thereof, the Assessment Committee may decide to exclude the member or alternates from discussions, decisions or tasks or voting where a Col is likely to occur. The member or alternate will not have access to information relating to the subjects deemed to constitute Col.

6.4 Assessment of value of declared gifts and decisions

The Assessment Committee shall assess the value of gifts, in case of doubt as to the value of a gift. Such evaluate should include an assessment of the value of similar/same objects.

6.5 Request for review of the Assessment Committee assessment

The member or alternate can request a review of the Assessment Committee's assessment. This request shall be sent within one month of the receipt of the Assessment Committee assessment with a clear and complete justification for the revision to the Chair of the Management Board. The Chair of the Management Board shall request the review of the Assessment Committee assessment.

In accordance with its own rules, the Assessment Committee will review the assessment by involving the representative, and its alternate, of an European Regulatory Agency as mentioned in Article 6.1.

The Assessment Committee shall provide a reviewed documented assessment to the Chair of the Management Board who shall transmit the result to the members and alternates.

The member or alternate shall be kept informed of the outcome of the request for review.

7 Breach of this policy

A breach of this policy is considered to occur in the following cases:

- (a) the assessment of a declaration of interests results in an omission of relevant interests resulting in a potential or actual Col.
- (b) the knowledge of non-consistent information of the declaration of gifts, hospitality, invitations, honours, or in case of failure to declare.

When the Chair of the Management Board becomes aware of a possible breach of the policy, he or she should consult the Assessment Committee, referred to in Article 6.

The member or alternate concerned should be contacted and given an opportunity to rectify the omission. The appointing authority of the member or alternate should be kept informed²⁰.

Should the Chair of the Management Board and the Assessment Committee not be satisfied with the corrective actions, they may decide on further actions to mitigate any existing or potential conflict of interest. Such actions should be notified to the member or alternate. If the member or alternate is not satisfied with the decision taken he or she may ask that the subject is discussed in the next Management Board meeting and noted in the minutes.

8 Training and information

The MB Secretariat will provide new members and alternates with training material on this Code of Conduct and the management of Col.

The training material will be provided to all members and alternates annually when the Public Annual Declaration of Interest exercise is launched.

²⁰ The appointing authority refers to the authority of a Member State or Observer which nominated the member or alternate.



Appendix II

DECLARATION OF COMMITMENT AND CONFIDENTIALITY

I, the undersigned <Full Name>, in my function as member of the <Management Board / PAR AG / other MB advisory group> of EASA, representing <Authority/Ministry and job title>.

- hereby undertake to act in the performance of my duties in the general interest of the European aviation safety system. In particular, I am aware of my responsibility to declare any interest which might be considered prejudicial.
- hereby declare that I am aware of my obligation to respect confidentiality, even after my duties have ceased, if the information is subject to a request for confidentiality or for reasons of professional secrecy. I shall also respect the confidential nature of the opinions expressed by other members during discussions in meetings or provided in written form.

DONE IN _____ ON _____

SIGNATURE:



Appendix III

PUBLIC ANNUAL DECLARATION OF INTERESTS (PADoI) FOR THE EASA MANAGEMENT BOARD, ITS WORKING OR ADVISORY GROUPS

In accordance with Article 4 of Appendix I to the EASA MB Decision 04-2021 *Code of Conduct for the MB of the EASA*, this form shall be used for the Public Annual Declaration of Interest (PADoI).

First Name	
Surname	
EASA body involved (MB and/or PAR-AG and/or Sub-Groups)	
Current Job Title	

I hereby declare to the best of my information, knowledge and belief that:

- I have no interest in relation with my duties and responsibilities within EASA
- I have interest in relation with my duties and responsibilities within EASA
- None of my close family members²¹ have interest in relation with my duties and responsibilities within EASA

Should there be any change to the information provided due to the fact that I acquire additional interests, I shall promptly notify the Agency and complete a new Public Annual Declaration of Interests. I understand that this Public Annual Declaration of Interests will be published on the EASA website and will be entered in a register held by the Agency. The Agency will handle the information provided above in accordance with Regulation (EU) 2018/1725²². Please read EASA's privacy policy on the processing of personal data on the occasion of the MB Code of Conduct (Declaration of Interest). Information regarding rights (access, rectification, deletion, etc.) and the treatment of your personal data can be found on the following link: <https://www.easa.europa.eu/data-protection>.

²¹ For this purpose 'close family members' are considered to be the persons forming a household with the person making the declaration (spouse, partner, and/or dependent children).

²² Regulation (EU) No 2018/1725 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001.



Title/Function (you or your close family members)	Period of activity (within past 5 years) *MM/YY– MM/YY	Company ²³ or organisation ²⁴	Description of the activity (including contracts with EASA as well as Products, Projects and/or Activity references)
1. Employment with a company or an organisation, including any contractual link (incl. NAA / MoT)			
2. Consultancy, legal representation, advice with a company or an organisation			
3. Membership of a Managing Board or equivalent structure of a company or an organisation			

²³ This includes any commercial business, industry association, consultancy, research institution or other enterprise whose funding is significantly derived from commercial sources. It also includes independent own commercial business, law offices, consultancies or similar.

²⁴ An 'organisation' includes governmental, international or non-profit organisations.

Title/Function (you or your close family members)	Period of activity (within past 5 years) *MM/YY– MM/YY	Company ²³ or organisation ²⁴	Description of the activity (including contracts with EASA as well as Products, Projects and/or Activity references)
4. Membership of an Advisory Board or equivalent structure of a company or an organisation			
5. Other membership or affiliation			
6. Research funding from a company or an organisation, including grants, rents, sponsorships, fellowships, non-monetary support			
7. Intellectual property rights (e.g. patent, trademark, copyright or proprietary know-how)			

Title/Function (you or your close family members)	Period of activity (within past 5 years) *MM/YY– MM/YY	Company ²³ or organisation ²⁴	Description of the activity (including contracts with EASA as well as Products, Projects and/or Activity references)
8. Investments in a company or an organisation, including holding of stocks and/or shares, stock options, equity, bonds, partnership interest in the capital of such undertaking, one of its subsidiaries or a company			
9. Public statements and positions for a company or an organisation as part of a regulatory, legislative or judicial process			
10. Other relevant information that could be seen as jeopardising your independence when working for the Agency			

Done at _____ on _____

Signature *[please also initial all pages]*: _____

